Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013

Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at http://www.pca.state.mn.us/ms4.

Submittal: This *MS4 SWPPP Application for Reauthorization* form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: Benton County *County: Benton
(city, county, municipality, government agency or other entity)

*Mailing address: 7752 Hwy 25 NE - PO Box 247

*City: Foley *State: MN *Zip code: 56329

*Phone (including area code): 320-968-5051 *E-mail: highway@co.benton.mn.us

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Byrd *First name: Chris
(department head, MS4 coordinator, consultant, etc.)

*Title: County Engineer/Public Works Director

*Mailing address: 7752 Hwy 25 NE - PO Box 247

*City: Foley *State: MN *Zip code: 56329

*Phone (including area code): 320-968-5051 *E-mail: cbyrd@co.benton.mn.us

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Byrd First name: Chris
(department head, MS4 coordinator, consultant, etc.)

Title: County Engineer/Public Works Director

Mailing address: 7752 Hwy 25 NE - PO Box 247

City: Foley State: MN Zip code: 56329

Phone (including area code): 320-968-5051 E-mail: cbyrd@co.benton.mn.us

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this *MS4 SWPPP Application for Reauthorization* form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

☒ Yes - *I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.*

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Chris Byrd
(This document has been electronically signed)

Title: County Engineer/ Public Works Director Date (mm/dd/yyyy): 12/09/2013

Mailing address: 7752 Hwy 25 NE - PO Box 247

City: Foley State: MN Zip code: 56329

Phone (including area code): 320-968-5051 E-mail: cbyrd@co.benton.mn.us

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☒ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships.*

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☒ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☒ Ordinance ☐ Contract language
   ☐ Policy/Standards ☐ Permits
   ☐ Rules
   ☒ Other, explain: County Development Code

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   Direct link:

   http://www.co.benton.mn.us/Dept_of_Development/Development_Code.php

   Specifically Sections 5.7 and 10.7

   http://www.co.benton.mn.us/About_Benton/Ordinances/382.pdf

   ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg.*

2. If **no:**

   Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☒ Other, explain: Development Code

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

http://www.co.benton.mn.us/Dept_of_Development/Development_Code.php

Specifically Sections 5.7 and 10.7

http://www.co.benton.mn.us/About_Benton/Ordinances/382.pdf

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The new 2013 MS4 General Permit is more stringent than our current regulatory mechanisms. More over, the Benton County development code and ordinances only cover non-urbanized/non-municipal areas of the County. The urbanized areas are controled by the local municipality. Over the next 12 months, we will evaluate, revise and/or expand our current development code and ordinances to meet the new permit requirements.

C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

1.	Best Management Practices (BMPs) to minimize erosion.	☐ Yes ☒ No
2.	BMPs to minimize the discharge of sediment and other pollutants.	☐ Yes ☒ No
3.	BMPs for dewatering activities.	☐ Yes ☒ No
4.	Site inspections and records of rainfall events	☐ Yes ☒ No
5.	BMP maintenance	☐ Yes ☒ No
6.	Management of solid and hazardous wastes on each project site.	☐ Yes ☒ No
7.	Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means.	☐ Yes ☒ No
8.	Criteria for the use of temporary sediment basins.	☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The new 2013 MS4 General Permit is more stringent than our current regulatory mechanisms. Over the next 12 months, we will evaluate, revise and/or expand our current regulatory mechanisms and ordinances to meet the new permit requirements.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
☒ Yes ☐ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☒ Ordinance ☐ Contract language
   ☐ Policy/Standards ☐ Permits
   ☐ Rules
   ☒ Other, explain: Development Code

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   Direct link:

   http://www.co.benton.mn.us/Dept_of_Development/Development_Code.php

   Specifically Sections 10.11.7 and 10.11.8

   ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

   a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of Total Suspended Solids (TSS).
      3) Stormwater discharges of Total Phosphorus (TP).

   b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of TSS.
      3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

   a. Limitations

      1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
         a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
         b) Where vehicle fueling and maintenance occur.
         c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
         d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.

      2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
         a) With predominately Hydrologic Soil Group D (clay) soils.
         b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
         c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn.

R. 4720.5100, subp. 13.

d) Where soil infiltration rates are more than 8.3 inches per hour.

3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No

1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.

2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.

3) Locations in the next adjacent DNR catchment area up-stream

4) Locations anywhere within the permittee's jurisdiction.

b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No

c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No

d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No

e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No

f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No

b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No

c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The new 2013 MS4 General Permit is more stringent than our current regulatory mechanisms. Over the next 12 months, we will evaluate, revise and/or expand our current BMPs and Ordinances to meet the new permit requirements.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs.*
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

   Over the next 12 months, we will evaluate the enforcement response preocedures that we have in our ordinances/development code to determine if they meet the new permit requirements or need to be updated.

B. Describe your ERPs:

Currently, our Development Code states the following:

Violations of conditions established in connection with the grants of varianace, conditional use permits and land use permits shall be a misdemeanor.

In the event of a violation or a threatened violation of this Ordinance, the County Board, in addition to other remedies, may institute appropriate action or proceedings to prevent, restrain, correct, or abate such violations or threatened violations.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The County maintains a collection of maps and construction plans that depict the size, approximate location and type of storm sewer facility within the old urbanized boundary area/MS4 area. Recently, the county has started locating storm water facilities using GPS survey equipment and mapping the coordinates on our GIS database. We are also adding other pertinent attributes to the stormwater facility such as size, type of material, and elevations.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☐ Yes ☒ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☐ Yes ☒ No
4. All receiving waters. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Over the past few years, our highway department has started locating existing and new drainage facilities using GPS surveying equipment. Along with the geographical location, the invert elevations, type of material, size and length of structure are being recorded. With this being said, some of our facilities have not been inventoried as described above. Over the 12 months following reauthorized permit coverage, we will continue to inventory our stormwater facilities within the urbanized boundary areas and update our storm sewer system map to meet the requirements of the new MS4 permit.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☒ Yes ☐ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☐ Yes ☒ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☐ Yes ☒ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Over the course of the 12 months following the receipt of reauthorization of permit coverage, our department will update our maps accordingly to include all ponds, wetlands, lakes and other appropriate receiving waters.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: http://www.pca.state.mn.us/ms4 , according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no,** the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

   Benton County's current public education and outreach program includes annual public hearings held at the County courthouse. During the meeting, new information and recommendations from the MPCA are shared with those who attend (which hasn't been very many - less than 5 per meeting). Flyers, like those mentioned in the MCM1 table below, are left available for meeting attendees to pick up at each meeting. With the advancements in social media sites and the increased use of the internet to find information, we are going to revamp our existing BMPs to better suite the needs and expectations of our constituents.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
1a-1: Distribute Educational Materials	Increase general public awareness/understanding of storm water issues and volunteer opportunities – on going
1b-1: Implement an Education program	Number of educational storm water articles/newsletters distributed – on going
1c-1: Education Program: Public Education and Outreach	Conduct a public hearing and annual newsletter – on going
1c-2: Education program: Public Participation	Receive public input and comments – on going
1c-3: Education Program: Illicit Discharge Detection and Elimination	Provide public with brochures regarding ways to minimize illicit discharges – on going
1c-4: Education Program: Construction Site run-off Control	Develop bulletin for construction site run-off control and distribute to target audience – June 2007
1c-5: Education Program: Post-Construction Stormwater management in New Development and Redevelopment	Monitor post-construction storm water management in new developments to verify whether county policies/ordinances are stringent enough – begin developing new policies/ordinances in 2007 (on going as necessary)
1c-6: Education Program: Pollution Prevention/Good Housekeeping for Municipal Operations	Gaining further understanding of permit requirements – on going
1d-1: Coordination of Education Program	Coordinate educational events/materials with nearby cities and townships - ongoing
1e-1: Annual Public Meeting	Conduct annual public meeting to educate the public - annually

BMP categories to be implemented	Measurable goals and timeframes
Construct a new Benton County MS4 website which will have links to adjacent MS4s and up-to-date educational information	Keep track of the number of visitor "hits" on website - On going
Start a Facebook or Twitter MS4 page to appeal to the younger generation who typically do not read hard print newspapers or news articles.	Keep track of the number of visitors/users on Facebook and Twitter accounts – on going
Delete/Remove all current MCM1 BMPs except the Annual Meeting and illicit discharge detection/reporting/elimination due to lack of interest/success	Effective at time of permit reauthorization

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Public Works Director / County Engineer

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

   Since our programs inception, we notified the public and held an annual meeting which coincided with a County Board meeting to update the public on recent concerns/issues and new developments with the County SWPPP. Unfortunately, we never received any feedback nor did we have many participants. The past few years we didn't hold an annual meeting due to lack of interest and thus need to revise our delivery methods to meet the lifestyles and needs of our constituents. We are going to use social media sites as an opportunity reach more people, especially those with busy lifestyles who don't have the time or resources to attend public meetings.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Comply Public Notice Requirements	Document the newspapers and dates published from the legal notice – on going
Solicit Public Input and opinion on the Adequacy of the SWPPP	Record attendance, keep minutes, record statements and written comments – on going
Consider Public Input	Public comments are accepted at any time, try to address comments within 7 days – on going

BMP categories to be implemented	Measurable goals and timeframes
Add a comment section to our current/proposed MS4 website to allow visitors the option of sending us electronic comments	Within 12 months of the date permit coverage is extended, we will modify the SWPPP section of our current website to include a comment section that can be filled out and sent while visiting the website

3. Do you have a process for receiving and documenting citizen input? ☒ Yes ☐ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Public Works Director / County Engineer

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

   We currently have an ordinance that prohibits illicit discharges and connections. The ordinance is all written into the County's Development Code. We inspect and note any illicit discharges while performing our annual inspections.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

   a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No

   b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No

   c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No

   d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No

   e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☐ Yes ☒ No

   f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No

   g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No

   h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☒ Yes ☐ No

   If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

   Over the 12 months following the date that permit coverage is extended, we will review and analyze our current ordinance and make any improvements/changes to it as necessary to meet current Permit guidelines. Also, we will modify our program to address staff training, identification of priority areas of concern, and procedures for identifying and investigating illicit discharges.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
3a-1: Storm Sewer System Map	Identify storm sewer system owned by Benton County within the urbanized boundary. A series of maps were collected and filed depicting the existing drainage system(s): pipe, ponds, lakes, streams, and wetlands within the urbanized boundary.
3b-1: Regulatory Control Program	Start an ordinance in order to enforce and access penalties for illicit discharge.

3c-1: Illicit Discharge Detection and Elimination Plan	Develop packets of information for distribution at annual meetings and other training opportunities to educate the public on prevention, detection and notification of illicit discharges.
3d-1: Public and Employee Illicit Discharge Information Program	Develop packets of information for distribution at annual meetings and other training opportunities to educate the public on prevention, detection and notification of illicit discharges.
3e-1: Identification of Non-Stormwater Discharges and Flows	Develop packets of information for distribution at annual meetings and other training opportunities to educate the public on prevention, detection and notification of illicit discharges.

BMP categories to be implemented	**Measurable goals and timeframes**
Storm Sewer System Map	We will consolidate our maps into one GIS database map system for easier use and updating. The map will include flow direction and location for all pipe 12" and larger with the urbanized areas of Benton County. We will also depict inplace structural BMPs on the map.
Staff Training	We will begin training new staff on how to detect, investigate and resolve illicit discharges.
Remove and replace the proposed purpose and function all non-functioning BMPs (3b-1 through 3d-1) with web-based Illicit Discharge Detection and Elimination Information	Within 12 months of the date permit coverage is extended

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☒ Yes ☐ No

   If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Public Works Director / County Engineer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

   The Benton County Development Code covers Non-County owned projects only and only in the Non-Urbanized and Non-Municipal Areas of the County. County owned projects are regulated by the NPDES ConstructionStormwater permit process and contain individual SWPPPs that the contractor is required to follow, with inspections being performed by County Engineering staff.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
   a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☐ Yes ☒ No
   b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☐ Yes ☒ No
   c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
   d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
      1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
      2) Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
      3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☐ Yes ☒ No

4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No

e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☐ Yes ☒ No

f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☐ Yes ☒ No

g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

Within the next twelve months, we will evaluate our existing Development Code to ensure that it is at least as stringent as the MPCA Construction Stormwater permit, and decide whether we will adopt applicable portions of the Benton County Development Code to cover county owned projects or establish a policy that adopts the standards of the MPCA Construction Storm Water permit. Within the urbanized boundaries of Benton County, the surrounding Municipalities (St. Cloud, Sartell, and Sauk Rapids) and Watab Township. Thus, for any project outside of County R.O.W. within the urbanized boundary, the applicable city or township would be responsible for overseeing construction permits. In months 1 - 3 we will review our policies and unwritten practices and in months 4 - 7 we will draft written procedures for the items as follows:

D.2.a Public Works will establish written procedures (SOPs) for site plan reviews for projects that occur within our road rights of way.

D.2.b Currently, our Contract Documents for road projects contains this language. We will incorporate it into the written SOPs.

D.2.c We will establish written SOPs for receipt and consideration of reports of non-compliance by the public.

D.2.d We will incorporate procedures for identifying priority sites, the frequency of site inspections, the names of those doing the inspections, and a form to use.

D.2.e We will ensure that plans submitted contain project name, location, total acreage disturbed and owner/operator information.

D.2.f We will document stormwater related comments.

D.2.g It is our current policy to retain construction site inspection checklists and we will incorporate this into our written SOPs.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Ordinance or Other Regulatory Mechanism	Develop and adopt an ordinance or other regulatory mechanism for construction site storm water runoff control. Audiences would be: some governmental agencies, construction companies, and other related business organizations. – December 2007 timeline for completion
Construction Site Implementation of Erosion and Sediment Control BMPs	Review proposed controls during preliminary and final plat approval per adopted ordinance/development code
Waste Controls for Construction Site Oeprators	Monitor and direct proper disposal of waste materials at construction sites.
Procedure for Site Plan Review	During preliminary/final plat approval, county will look for permits, location of work in relation to receiving water bodies.
Establishment of Procedures for the Receipt and Consideration of Reports of Storm Water Noncompliance	Develop a standardized form for reporting incidents of storm water runoff issues.
Establishment of Procedures for Site Inspection and Enforcement	Create a checklist which can be used to evaluate a construction site. The form will include the type of violation, the fine (if applicable) and any follow up information.
BMP categories to be implemented	**Measurable goals and timeframes**

Eliminate previous BMPs since they are only related to Non-County owned projects.	Effective at time of permit reauthorization
Modify County Development Code/Ordinance to ensure it is at least as stringent as MPCA CSW permit and decide whether to adopt it for County owned projects or implement a policy that adopts the CSW for County owned projects	Within twelve months of permit coverage

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Public Works Director / County Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

   The Benton County Development Code covers non-county owned projects only and only in the Non-Urbanized and Non-Municipal Areas of the County. County owned projects are regulated by the NPDES Construction permit process and contain individual SWPPPs that the contractor is required to follow, with inspections being performed by County Engineering staff.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☐ Yes ☒ No

3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):

   a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☐ Yes ☒ No

   b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No

   c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No

   d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

   If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

   Within the next twelve months, we will evaluate our existing ordinance to ensure that it is at least as stringent as the MPCA Construction Stormwater permit, and decide whether we will adopt the Benton County Development Code/Ordinance to cover county owned projects or establish a policy that adopts the standards of the MPCA Construction Storm Water permit.

   E.2. Public Works will establish written procedures (SOPs) for site plan reviews for projects that occur within our road rights of way.

   E.3. Establish written SOPs for gathering and retaining supporting documentation to determine compliance while conducting site plan reviews, including checklists and calculations.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Development and Implementation of Structural and/or Non-Structural BMPs	Create a compilation of BMPs to be used on County Projects. Updates and additions to be performed as necessary.

Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment	Financial guarantees are not released until the site is approved by the design engineer
Long Term Operation and Maintenance of BMPs	Includes periodic inspections of inplace BMPs and facilities. Benton County Maintenance forces to perform necessary repair/replacement work

BMP categories to be implemented	**Measurable goals and timeframes**
Modify County Development Code/Ordinances to ensure they are at least as stringent as MPCA CSW permit and decide whether to adopt it for County owned projects or implement a policy that adopts the CSW for County owned projects	Within 12 months of permit coverage

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Public Works Director / County Engineer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

   Within the urbanized areas in Benton County, the streets are swept on an annual basis and additionaly as needed. 20% of the outfalls are inspected each year. Currently, the county does not have any material handling or stockpiled material within the urbanized boundaries. The county currrently houses all of it's salt and sand materials at the Foley shop to minimize impacts to the environment and decrease operating expenses.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

   We will review our facilities within the Urbanized Areas that may contribute pollutants to stormwater discharges.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Municipal Operations and Maintenance Program	Implement an inspection program that will minimize adverse effects of storm water runoff – Inspection program to be reviewed annually and updated as necessary
Street Sweeping	Record number of times annually the streets are swept.
Annual Inspection of all Structural Pollution Control Devices	Record the number of structural pollution prevention control devices inspected along with the sediment level and condition of the device
Inspection of a minimum of 20% of its outfalls,	Record number of outfalls inspected and rate the condition of

sediment basins and ponds	outfalls and ponds
Annual Inspection of all Exposed Stockpiles, Storage and Material Handling Areas	Document number of stockpiles inspected and material handling areas inspected (note: we do not have any of these facilities in the MS4 boundary areas)
Inspection Follow-Up including determination of whether Repair, Replacement, or Maintenance Measures are necessary and the Implementation of the Corrective Measures	Document the dates and locations of any corrective action taken
Record Reporting and Retention of All Inspections and Responses to the Inspection	Set up and maintain centralized filing system
Evaluation of Inspection Frequency	Document and evaluate the effectiveness of the inspection frequency. Make adjustments as necessary.

BMP categories to be implemented	**Measurable goals and timeframes**
Upgrade our record keeping method to digital GIS database	Upgrade record keeping and inspection procedure as resources become available

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☒ Yes ☐ No

   a. If **no**, continue to 6.

   b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm. Is a map including the following items available for your MS4:

      1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☒ Yes ☐ No

      2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☒ No

   c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☒ No

6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No

7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:

   a. Addresses the importance of protecting water quality? ☐ Yes ☒ No

   b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No

   c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

F.5.c. We will develop BMPs to protect Source Water Protection Areas as necessary.

F.6. At this time, the County does not own or operate any ponds within the urbanized boundary areas. In the future, if ponds are created for the treatment of storm water runoff the County will develop procedures for determining TSS and

TP treatment effectiveness per the current MS4 permit requirements.

F.7. We will develop inspection procedures that meet the requirements of the permit.

F.8.a.b.c We will develop a training program commensurate with each employee's job duties that addresses these three topics.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

    Public Works Director / County Engineer

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☒ Yes ☐ No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention**:** *MS4NameHere_TMDL.*

   This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.
   This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VIII. Add any Additional Comments to Describe Your Program

Compliance Schedule PART II.D.6.f.-g.

Is your MS4 currently meeting its WLA for any approved TMDLs? **Go to:**

☐ **NO** (Complete Table 1, Strategies for continued BMP implementation beyond the term of this permit, and Table 2 below) Table 1

☑ **YES** (Provide the following information below)

If YES, indicate the WLAs (may be grouped by TMDL Project) you believe are reasonably being met. For each WLA, list the implemented BMPs ar continuation of meeting each WLA. PART II.D.6.g.(1)-(2)

Little Rock Lake Nutrient TMDL:

Benton County CSAH 13 has open ditches that are within the urbanized boundary and this WLA area. The nutrient of concern Phosphorus. Within Bento Currenty the open ditches have established vegetation and no fetrilizers containing Phosporus should be used. The TMDL Implementation plan does not However, it does state that if and when a construction project were initiated a reduction of 55% is required. If any construction activities that are permi vegetation, the use of fertilizers will be limited to reduce runoff containing Phosphorus. Approved soil stabilization methods will be used to generate ve

Table 1

Fill in the following table with your Interim Milestones, BMP IDs, and Implementation Dates. Replace "TMDL Project Name & Pollutant" Columns corresponding pollutant. Then put an "X" in the boxes for the TMDL that corresponds with each BMP. PART II.D.6.f.(1)-(2)

NOTE:

It is recommended to assign each Interim Milestone (BMP) a BMP ID. You will be required to report on the status of each Interim Milestone and include numbers at the time of application may be useful in tracking implementation efforts. If a pond that will be included in the pond inventory (Part III.C.2.) is BMPs are not required to have an ID, but it may be useful to assign it an ID for internal MS4 recordkeeping.

MPCA recommends the Implementation Dates align with the submittal of MS4 Annual Reports. Dates selected may not reflect the actual date a BMP is ir

Interim Milestone (Best Management Practice)	BMP ID	Implementation Date
Combine efforts with the Benton County Department of Development to educate the public on conservative landscaping and development practices	TBD with revised SWPPP Doc.	Continuous
Continue enforcing strict Construction Project BMPs on County Construction Projects	TBD with revised SWPPP Doc.	Continuous
Discontinue the use of fertilizers containing Phosphorus in County ditches/boulevards	TBD with revised SWPPP Doc.	2018

Reconstruction of CSAH 3 (Golden Spike Road NE) from TH 10 **east** to CSAH 1 - includes the addtion of a storm water collection and pond system	TBD with revised SWPPP Doc.	2015
Reconstruction of CSAH 3 (Golden Spike Road NE) from TH 10 **west** to 3rd Avenue N - includes the update and reconstruction of the outdated storm sewer collection system and the creation of new ponding systems or a compact underground storm water treatment system to aid in the removal of TSS and debris	TBD with revised SWPPP Doc.	2021
Continue maintaining county road ditches to address erosion issues and washouts	TBD with revised SWPPP Doc.	Continuous

Strategies for continued BMP implementation beyond the term of this permit. PART II.D.6.f.(3)

Most of the BMPs mentioned above are typical/routine maintenance items that the County Highway Department facilitates to meet their long-term mai occurs, and urbanized boundary along the County's western boundary expands, the proposed and existing BMPs will continue to evolve to meet changin County Construction Projects will also be designed and administered to address current and future erosion concerns/requirements.

Table 2
Target dates the applicable WLA(s) will be achieved. PART II.D.6.f.(4)

TMDL Project	Target Date to Achieve WLA
Elk River Watershed – Multiple Impairments TMDL - Phosphorus	2030
Elk River Watershed – Multiple Impairments TMDL - TSS	2030
Elk River Watershed – Multiple Impairments TMDL - E. Coli	2030

Go to: Strategies…
Go to: Table 2

nd provide a narrative strategy for the long-term

on County's jurisdiction is the CSAH 13 right of way.
t call for any reduction for standard conditions.
tted within the right-of-way disturb soil and/or
getative cover.

with each TMDL Project Name and the

a BMP ID for all structural BMPs as part of the MS4 Annual Report (see Part III.E.), so including those ID
to be applied toward a WLA, use the same ID for both the pond inventory and TMDL tracking. Non-structural

mplemented, but shall indicate a BMP will be implemented on that date or before for that reporting year.

Elk River Watershed – Multiple Impairments TMDL - Phosphorus	Elk River Watershed – Multiple Impairments TMDL - TSS	Elk River Watershed – Multiple Impairments TMDL - E. Coli
X	X	X
X	X	X
X		

X	X	
X	X	
X	X	

intenance goals and priorities. As development
ıg demands and permit requirements. Benton

TMDL Wasteload Allocation Excel Spreadsheet PART II.D.6.a.-e.

Copy and paste from the Master List MS4 TMDL Spreadsheet for your MS4 to the space below.

Attach this completed form with your SWPPP Document at the time of submittal. At a ***minimum,*** *provide all of the information "*" items (TMDL Project Name, Type of WLA, Numeric WLA, Unit, Flow Condition, and Pollutant of Concern).*

Permittee name	**Preferred ID**	**TMDL project name***	**Waterbody ID**
Benton County	MS400067	Little Rock Lake Nutrient TMDL	05-0013-00
Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	71-0141-00
Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	07010203-579
Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	07010203-579
Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	07010203-579
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Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	07010203-579
Benton County	MS400067	Elk River Watershed – Multiple Impairments TMDL	05-0007-00

Type of WLA*	Numeric WLA*	Unit*	Percent reduction	Flow condition*	Waterbody name	Pollutant of concern*	Date approved
Categorical	0.5	kg/day	55%	N/A	Little Rock Lake	Phosphorus	2/2/2012
Categorical	7.48	lbs/day		N/A	Big Elk Lake	Phosphorus	6/14/2012
Categorical	0.13	tons/day		High	Elk River: Big Elk Lake to St. Francis	TSS	6/14/2012
Categorical	0.05	tons/day		Moist	Elk River: Big Elk Lake to St. Francis	TSS	6/14/2012
Categorical	0.03	tons/day		Mid-Range	Elk River: Big Elk Lake to St. Francis	TSS	6/14/2012
Categorical	0.02	tons/day		Dry	Elk River: Big Elk Lake to St. Francis	TSS	6/14/2012
Categorical	0.01	tons/day		Low	Elk River: Big Elk Lake to St. Francis	TSS	6/14/2012
Categorical	539.43	10^9 organisms/day	0%	High	Elk River: Big Elk Lake to St. Francis	E. Coli	6/14/2012
Categorical	203.99	10^9 organisms/day	0%	Moist	Elk River: Big Elk Lake to St. Francis	E. Coli	6/14/2012
Categorical	101.84	10^9 organisms/day	0%	Mid-Range	Elk River: Big Elk Lake to St. Francis	E. Coli	6/14/2012
Categorical	61.01	10^9 organisms/day	0%	Dry	Elk River: Big Elk Lake to St. Francis	E. Coli	6/14/2012
Categorical	26.95	10^9 organisms/day	0%	Low	Elk River: Big Elk Lake to St. Francis	E. Coli	6/14/2012
Categorical	0	lbs/day		N/A	Mayhew Lake	Phosphorus	6/14/2012